

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GULF UNDERWRITERS INS. CO.,
as Subrogee of Games and Lanes, Inc.

Plaintiff,

VS.

INTERNATIONAL BAR TECH SOLUTIONS,
INC.

Defendant.

CASE NO: 04-30203-MAP

JOINT SCHEDULING STATEMENT

The parties in the above-captioned action, by their attorneys, submit the following joint scheduling statement pursuant to the provisions of Fed. R. Civ. P. 16(b) and L.R. 16.1. An initial scheduling conference will be held at 11:00 a.m. on January 27, 2005.

I. Obligation of Counsel to Confer

Counsel have conferred in accordance with the provisions of L.R. 16.1. The parties have agreed to explore the possibility of Alternative Dispute Resolution upon completion of discovery.

II. Proposed Joint Discovery Plan

a. Phase I

- i. Plaintiff and Defendants to provide documents required by Fed. R. Civ. P. 26(a) and L.R. 26 (2) no later than March 1, 2005.
- ii. Written discovery shall be served by March 22, 2005.
- iii. Answers and responses to written discovery to be served no later than May 16, 2005.
- iv. Non-expert depositions to be completed by July 29, 2005.

b. Phase II

- i. The Plaintiff is to identify its expert witnesses and make expert disclosures, as required by Rule 26(a)(2) no later than August 30, 2005.
- ii. The Defendant is to identify their expert witnesses and make expert disclosures, as required by Rule 26(a)(2) no later than September 30, 2005.
- iii. Expert depositions to be completed by November 15, 2005.
- iv. Discovery to be completed by December 1, 2005.

c. Filing of Motions

- i. Motions for Summary Judgment should be filed no later than December 15, 2005.

The parties have agreed to the proposed scheduling statement as set forth above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Joseph S. Sano, hereby certify that on January 25, 2005, I served the within document by causing copies to be mailed, by first class mail, postage prepaid, to counsel of record for all parties.

/s/Joseph S. Sano
Joseph S. Sano

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